

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA**

In re:	§	
	§	Chapter 7
	§	Case No. 24-30167
Pro-Mark Services, Inc.,	§	
	§	
Debtor.	§	
	§	
<hr style="width: 50%; margin-left: 0;"/>	§	Adv. No. 24-07014
ERIK A. AHLGREN, as Chapter 7	§	
trustee of Bankruptcy Estate of Pro-	§	
Mark Services, Inc., as Administrator of	§	
the Pro-Mark Services, Inc. Employee	§	
Stock Ownership Plan, and as Trustee of	§	
the Pro-Mark Services, Inc. Employee	§	
Stock Ownership Trust,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
CONNIE BERG, KYLE BERG, CONNIE	§	
BERG REVOCABLE LIVING TRUST,	§	
KYLE R. BERG REVOCABLE LIVING	§	
TRUST, CHAD DUBOIS, MANDY	§	
GRANT, and MIGUEL PAREDES,	§	
	§	
Defendants.	§	

BERG DEFENDANTS' DEMAND FOR JURY TRIAL

Come now, Connie Berg, Kyle Berg, Connie Berg Revocable Living Trust, and Kyle R. Berg Revocable Living Trust (collectively, the “Berg Defendants”), by and through their undersigned counsel of record, and expressly subject to their Motion to Dismiss filed on November 22, 2024 (Dkt. 49) files their demand for a jury trial in connection with any triable issues related to the complaint (as amended at Docket No. 11, the “Complaint”) filed by Erik A. Ahlgren in his official capacity as Chapter

7 trustee of the Debtor's bankruptcy estate (the "Trustee") pursuant to Federal Rule of Bankruptcy Procedure 9015 and Federal Rule of Civil Procedure 38. The Berg Defendants do not consent to a jury trial conducted by the Bankruptcy Court.

Dated: November 22, 2024

/s/ Stephen M. Pezanosky
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*Attorneys for Defendants Connie Berg, Kyle Berg,
Connie Berg Revocable Living Trust, Kyle R. Berg
Revocable Living Trust*

CERTIFICATE OF SERVICE

The undersigned certifies that on the 22 day of November 2024, the above document was served on all counsel of record via CM/ECF, including the Trustee and his counsel.

/s/ Aimee M. Furness
Aimee M. Furness